

RECEIVED

DEC 22 2022  
PG

IN THE UNITED STATES DISTRICT COURT

PETER A. MOORE, JR., CLERK  
US DISTRICT COURT, EDC FOR THE EASTERN DISTRICT OF NORTH CAROLINA

Southern DIVISION

Lagenia Simmons

\_\_\_\_\_

\_\_\_\_\_

(Enter above the full name  
of the Plaintiff[s] in this  
action).

Case No. 7:22-cv-223-M

(To be assigned  
by the Clerk of  
District Court)

vs.

Brunswick County Schools

Steve Barger

Stephen Foster

\_\_\_\_\_

(Enter above the full name of  
**ALL** Defendant[s] in this action.  
Fed.R.Civ.P.10(a) requires that  
the caption of the complaint  
include the names of **all** the  
parties. Merely listing one  
party and "et al." is insufficient.  
Please attach additional sheets if  
necessary).

COMPLAINT

1. Plaintiff resides at 108 Apple Rd Castle Hayne,  
NC 28429.

2. Defendant(s) name(s): Steve Barger, Stephen Foster  
Brunswick County Schools

Location of principal office(s) of the named defendant(s):

Brunswick County School Board

Nature of defendant(s) business: School System

Approximate number of individuals employed by defendant:

300 or more

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on this court by 42 U.S.C. § 2000e-5. Equitable and other relief are also sought under 42 U.S.C. § 20003-5(g).

4. The acts complained of in this suit concern:

- (A) \_\_\_\_\_ Failure to employ me.
- (B) ☒ Termination of my employment.
- (C) \_\_\_\_\_ Failure to promote me.
- (D) \_\_\_\_\_ Other acts as specified below:

5. Plaintiff is:

(A) \_\_\_\_\_ presently employed by the defendant.

(B) ☒ not presently employed by the defendant.

The dates of employment were Jan 2013 - Oct 2021

Employment was terminated because:

(1) ☒ plaintiff was discharged.

(2) \_\_\_\_\_ plaintiff was laid off.

(3) \_\_\_\_\_ plaintiff left job voluntarily.

6. Defendant(s) conduct is discriminatory with respect to the following:

(A) ☒ my race.

(B) \_\_\_\_\_ my religion.

(C) \_\_\_\_\_ my sex.

(D) \_\_\_\_\_ my national origin.

(E) \_\_\_\_\_ other as specified below:

7. The name(s), race, sex, and the position or title of the individual(s) who allegedly discriminated against me during the period of my employment with the defendant company is (are):

Stephen Foster & Steve Barger along with Brunswick County Schools discriminated in Oct 2021. They tried to say I let my son come with covid when I did, but 3 white employees had covid & knew they had it & didn't loose their job.

8. The alleged discrimination occurred on or about Oct 2021

9. The nature of my complaint, i.e., the manner in which the individuals(s) named above discriminated against me in terms of the conditions of my employment is as follows:

They fired me thinking I brought my son to work / School with covid & there were 3 employees or more that's white that had covid & knew they had it & they still have their jobs.

10. The alleged illegal activity took place at: Brunswick County Schools.

11. I filed charges with the Equal Employment Opportunity Commission regarding defendant(s) alleged discriminatory conduct on or about 4/11/2022. I have attached a copy of the Notice of Right to Sue letter issued by the Equal Employment Opportunity Commission. This letter was received by me on 9/25/22.

12. I seek the following relief:

- (A) ☒ recovery of back pay;
- (B) ☐ reinstatement to my former job;
- (C) ☒ trial by jury on all issues so triable;
- and any other relief as may be appropriate, including  
injunctive orders, damages, costs and attorney's fees.

12/19/22

Date



Signature of Plaintiff

108 Apple Rd

Castle Hayne, NC 28429

(910) 540-9572

Address and Phone Number of Plaintiff